

Heavy Lift Helicopters, Inc.



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FAA CRS # H3VR008H

March 09, 2005

Deepak Joshi
Lead Aerospace Engineer, (Structures)
National Transportation Safety Board, Rm. 5235
490 L'Enfant Plaza, SW
Washington, DC 20594

Dear Mr. Joshi:

The following is regarding NTSB Notice of Proposed Rulemaking (NPRM 427) posted in the Federal Regulation pages 77150 to 77152 on December 27, 2004 that proposes to eliminate ground rotor blade strike exemption from the "Substantial Damage" definition of 47 CFR 830.2.

Heavy Lift Helicopters, Inc. (HLH) strongly opposes the elimination of this exemption. This proposed change will cause a serious financial burden to HLH due to increased downtime of our helicopters resulting from the required reporting procedures of a "Substantial Damage". HLH helicopters are used for firefighting and used in very remote areas of our national forests. It is our experience that most "ground blade strikes" are usually minor incidents and do not cause any substantial damage to any rotating parts or the airframe itself. The manufacturers' maintenance manuals explicitly cover the required inspections after a ground blade strike. If any damage is found, it is usually limited to the blade tip cap.

We appreciate any help you can provide to prevent this amendment to be implemented. Unlike that of a fixed wing aircraft, a rotor blade is easily removed, inspected, and replaced. When the proper guidelines are followed, the helicopter that has been found to have no further damage can be quickly and safely returned to service by today's existing procedures.

If this amendment did pass and minor incidents had to be handled with all the actions and costs of a real accident, it would greatly reduce firefighting effectiveness by making all efforts come to a halt. This could result in increased fire damage, the fire becoming uncontrollable, and possible loss of life due to our inability to continue our response.

Sincerely,

Richard Proctor
Director of Maintenance

cc: Wanda Rogers

Fire Fighting

Construction

Heavy Lifting

Power Line

Logging